1	SIGAL CHATTAH United States Attorney	
2	District of Nevada Nevada Bar No. 8264	
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8	Thomeyoyer me omice states	
9	UNITED STATES I DISTRICT O	
10	Brandon Kotaniemi, individually and as special	Case No. 2:25-cv-00540-APG-MDC
11 12	co-administrator of the Estate of Marsha Kotaniemi; Steven Kotaniemi, individually and as special co-administrator of the Estate of	Stipulation and Order for Extension of
13	Marsha Kotaniemi,	Time to Respond to Complaint
14	Plaintiffs,	(SECOND REQUEST)
15	v.	
16	Brian C. Ward, MD, an individual in his	
17	official capacity; Stephanie Martinez, MD, an individual in her official capacity; Emily	
18	Tibbits, MD, an individual; Lisa Angotti, MD an individual; State of Nevada ex rel	
19	The Board of Regents of the Nevada System of Higher Education ex rel the University of	
20	Nevada, Las Vegas, a political subdivision;	
21	DOE INDIVIDUALS I-X, inclusive; and ROE CORPORATIONS I-X, inclusive,	
22	Defendants.	
23		
24	Plaintiffs Brandon Kotaniemi and Steven Kotaniemi, through counsel and the	
25	United States of America, on behalf of federal defendants, Emily Tibbits, MD and Lisa	
26	Angotti, MD ("United States" and/or "Federal Defendant"), hereby stipulate and agree a	
27	follows:	
28		

	1. Plaintiffs filed their complaint	in the Eighth Judicial District Court Clark	
County, Nevada on February 4, 2025.			
2. Federal Defendant United States removed this case to the United S		tes removed this case to the United States	
District Court, District of Nevada on March 24, 2025.			
3. The Court granted a prior Stipulation and Order entered into bet		ulation and Order entered into between	
Plaintiff and the United States making the United States' response to the complaint d			
April 16, 2025 (ECF No. 9)			
	4. The parties stipulate and agree that the United States shall have through		
	April 29, 2025, to file its response to the complaint.		
5. United States' counsel has had multiple, conflicting deadlines such that s			
	has been unable to coordinate with the parties to discuss the United States' response to the		
	complaint and needs additional time to do so.		
	Therefore, the parties request that the Court extend the deadline for the United		
States to respond to Plaintiffs' complaint through April 29, 2025.			
	This stipulated request is filed in good faith and not for the purpose of undue delay Respectfully submitted this 15th day of April, 2025.		
		SIGAL CHATTAH United States Attorney	
THE POWELL LAW FIRM			
	/s/ Tom W. Stewart TOM W. STEWART 8918 Spanish Ridge Avenue, Suite 100 Las Vegas, Nevada 89148 Attorney for Plaintiffs	/s/ Karissa D. Neff KARISSA D. NEFF Assistant United States Attorney Attorneys for Federal Defendants	
	IT IS SO ORDERED:		
	UNITED STATES MAGISTRATE JUDG		
	DATED:		